

EXHIBIT 7

UNREDACTED PUBLIC VERSION

From: [Rachuba, L Roman](#)
To: [Alex Menchaca](#); [Cooper, Luke W.](#); ["Morgan M. Daughton"](#); [Ben J. Mahon](#); [Benjamin J. Schladweiler](#); [Brad P. Loren](#); [Rajendra A. Chiplunkar](#); [Renee Mosley-Delcollo](#); [avondermehden@mcandrews-ip.com](#); [Dorien J. Clark](#); [Electronic Case Mgmt](#)
Cc: [Daniel A. Taylor](#); [Callahan, John T.](#); [Dzwonczyk, Michael R.](#); [Neal C. Belgam](#)
Subject: RE: Ingenus Pharmaceuticals, LLC, et al. v. Accord Healthcare, Inc. - Expert Report of Stephen A. Holzen -- Accord motion to strike
Date: Friday, December 13, 2024 10:42:25 AM
Attachments: [image001.png](#)

Alex,

Below summarizes our brief meet and confer of today.

You began the call by informing us that Defendant intends to move to strike the portions of Mr. Holzen's report you identified below. After I explained that we disagree that the bases for Mr. Holzen's opinions were not previously disclosed (at least because his opinions on licensing and commercial sales are covered under long-felt need), I inquired whether there was any remedial action (including the possibility of additional discovery) that Plaintiffs could take to avoid burdening the Court with this issue. You indicated that there was not.

At this time, we remain open to assisting with potential additional discovery.

Thanks,
Roman

From: Rachuba, L Roman
Sent: Thursday, December 12, 2024 3:08 PM
To: 'Alex Menchaca' <AMENCHACA@mcandrews-ip.com>; Cooper, Luke W. <lcooper@sughrue.com>; 'Morgan M. Daughton' <mداughton@skjlaw.com>; Ben J. Mahon <BMahon@mcandrews-ip.com>; Benjamin J. Schladweiler <schladweilerrb@gtlaw.com>; Brad P. Loren <BLoren@mcandrews-ip.com>; Rajendra A. Chiplunkar <RChiplunkar@mcandrews-ip.com>; Renee Mosley-Delcollo <renee.delcollo@gtlaw.com>; avondermehden@mcandrews-ip.com; Dorien J. Clark <DClark@mcandrews-ip.com>; Electronic Case Mgmt <E@mcandrews-ip.com>
Cc: Daniel A. Taylor <DAT@skjlaw.com>; Callahan, John T. <jcallahan@sughrue.com>; Dzwonczyk, Michael R. <mdzwonczyk@sughrue.com>; Neal C. Belgam <NCB@skjlaw.com>
Subject: RE: Ingenus Pharmaceuticals, LLC, et al. v. Accord Healthcare, Inc. - Expert Report of Stephen A. Holzen -- Accord motion to strike

Hi Alex, we're still reviewing the reports and will get back to you regarding the confidential information.

With respect to your allegations regarding Mr. Holzen's report, we are available tomorrow at 10 AM ET or Monday 12-2 PM ET for a meet and confer.

Best,
Roman

From: Alex Menchaca <AMENCHACA@mcandrews-ip.com>

Sent: Wednesday, December 11, 2024 11:32 AM

To: Cooper, Luke W. <lcooper@sughrue.com>; 'Morgan M. Daughton' <mdaughton@skjlaw.com>; Ben J. Mahon <BMahon@mcandrews-ip.com>; Benjamin J. Schladweiler <schladweilerb@gtlaw.com>; Brad P. Loren <BLoren@mcandrews-ip.com>; Rajendra A. Chiplunkar <RChiplunkar@mcandrews-ip.com>; Renee Mosley-Delcollo <renee.delcollo@gtlaw.com>; avondermehden@mcandrews-ip.com; Dorien J. Clark <DClark@mcandrews-ip.com>; Electronic Case Mgmt <E@mcandrews-ip.com>

Cc: Daniel A. Taylor <DAT@skjlaw.com>; Callahan, John T. <jcallahan@sughrue.com>; Rachuba, L Roman <lrachuba@sughrue.com>; Dzwonczyk, Michael R. <mdzwonczyk@sughrue.com>; Neal C. Belgam <NCB@skjlaw.com>

Subject: Ingenus Pharmaceuticals, LLC, et al. v. Accord Healthcare, Inc. - Expert Report of Stephen A. Holzen -- Accord motion to strike



Counsel,

Thank you for the reports served on December 9, 2024. We note that the reports are designated HIGHLY CONFIDENTIAL OUTSIDE COUNSEL EYES ONLY.

From our review, it appears that the reports include no Plaintiffs' confidential information. Please confirm that there is no Plaintiffs' confidential information in the reports and that these reports may be shared with Accord and Intas.

Regarding the report of Stephen Holzen, that report addresses issues that were not disclosed during discovery related to objective indicia, in particular regarding licensing and the commercial sales. (See, e.g., Plaintiffs' response to interrogatory no. 6.)

Accord intends to move to strike paragraphs 33-49, 51-60, 69 of Mr. Holzen's report, as Accord previously advised. (See 2024-10-14 Menchaca email.)

Please let us know when you are available Thursday, December 12, or Friday, December 13, to meet and confer regarding Accord's motion to strike.

Best regards,
Alex.



Alejandro Menchaca

Attorney at Law

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From: Cooper, Luke W. <lcooper@sughrue.com>

Sent: Monday, December 9, 2024 3:50 PM

To: 'Morgan M. Daughton' <mdaughton@skjlaw.com>; Alex Menchaca <AMENCHACA@mcandrews-ip.com>; Ben J. Mahon <BMahon@mcandrews-ip.com>; Benjamin J. Schladweiler <schladweilrb@gtlaw.com>; Brad P. Loren <BLoren@mcandrews-ip.com>; Rajendra A. Chiplunkar <RChiplunkar@mcandrews-ip.com>; Renee Mosley-Delcollo <renee.delcollo@gtlaw.com>; Annette Vonder Mehden <AVONDERMEHDEN@mcandrews-ip.com>

Cc: Daniel A. Taylor <DAT@skjlaw.com>; Callahan, John T. <jcallahan@sughrue.com>; Rachuba, L Roman <lrachuba@sughrue.com>; Dzwonczyk, Michael R. <mdzwonczyk@sughrue.com>; Neal C. Belgam <NCB@skjlaw.com>

Subject: Case 1:23-cv-00377-CFC, Ingenus Pharmaceuticals, LLC, et al. v. Accord Healthcare, Inc. - Expert Report of Stephen A. Holzen

CAUTION: External Email From: lcooper@sughrue.com

Counsel,

Attached please find the Affirmative Expert Report of Stephen A. Holzen.

Respectfully,

Luke Cooper
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SughrueLogo



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